

Certified Mail Number 2 189-992-722

May 12, 1995

Art Spratlin
Director, Air/RCRA/Toxics Division
United States Environmental Protection Agency, Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: **Hydrocarbon Recyclers, Inc. of Wichita d/b/a USPCI (HRIW)**
EPA ID No. KSD007246846 Hazardous Waste Facility Permit,
Class I Permit Modification

PRMT
RCRA
Mark
RECEIVED

MAY 15 1995

AIR & TOXICS
DIVISION

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MAY 16 1995

PRMT=SECTION

Dear Mr. Spratlin:

Pursuant to 40 CFR 270.42(g), HRIW requests a modification to our RCRA Permit to add those new wastes identified by the final rule of February 9, 1995. In accordance with subparagraph (g)(ii) this request constitutes a Class 1 Permit Modification. HRIW will submit the Class 2 Modification required by Subparagraph (g)(iv) and Appendix I within 180 days of the effective date of the rule.

Please find attached: A, a list of the wastes to be added; and B, instructions for replacement of the pages revised in Parts A and B of the Permit Application. Enclosed are revised pages for inclusion in Part A, and Section C of Part B of the RCRA/HSWA Permit Application. The text of Section H, Contingency/Emergency Plan, was corrected to include these new wastes by our modification dated April 11, 1995. The revised pages reflect:

1. addition of the newly listed wastes to the list in Part A of the Permit Application, pages G 6 of 7, N 6 of 7 through S 6 of 7, and 7 of 7;
2. additions of the newly listed wastes to the list in Appendix C-A to Section C - Waste Characterization, of Part B of the Permit application, replacing all of Attachment C-B - Waste List.

No deletions were made to the text. A copy of the text with additions marked in highlight is included to facilitate review.

HRIW thanks you for the opportunity to make these corrections. Directions for replacing the revised pages are attached. Please contact Ronald Robertson at the HRIW facility if you have questions regarding these matters.

Sincerely,

Stephen M Keiter

Stephen M. Keiter, Facility Manager
Hydrocarbon Recyclers, Inc. of Wichita

Enclosure

page 1



cc: C. Strecker, KDHE
M. Bradbury, KDHE District Office
A. Chadwick, LES
Permit File

Hydrocarbon Recyclers, Inc. of Wichita
Class 1 Permit Modification
May 12, 1995
Attachment A: Waste List
Page 1 of 4

- | | |
|----------|--|
| K156 (T) | Organic Waste (including heavy ends, still bottoms, light ends, spent solvents, filters, and decantates) from the production of carbamates and carbamoyl oximes. |
| K157 (T) | Wastewaters (including scrubber waters, condenser waters, washwaters, and separation waters) from the production of carbamates and carbamoyl oximes. |
| K158 (T) | Bag house dusts and filter/separation solids from the production of carbamates and carbamoyl oximes. |
| K159 (T) | Organics from the treatment of thiocarbamate wastes. |
| K160 (T) | Solids (including filter wastes, separation solids, and spent catalysts) from the production of thiocarbamates and solids from the treatment of thiocarbamate wastes. |
| K161 (T) | Purification solids (including filtration, evaporation, and centrifugation solids), bag house dust and floor sweepings from the production of dithiocarbamate acids and their salts. (This listing does not include K125 or K126.) |

Hydrocarbon Recyclers, Inc. of Wichita
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Attachment A: Waste List
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P127	7-Benzofuranol, 2,3-dihydro-2,2-dimethyl,methylcarbamate (Carbofuran)
P128	Phenol, 4-(dimethylamino)-3,5-dimethyl-, methylcarbamate (ester) (Mexacarbate)
P185	1,3-Dithiolane-2-carboxaldehyde, 2,4-dimethyl, O-[(methylamino)carbonyl]oxime (Tirpate)
P188	Benzoic acid, 2-hydroxy, compd. with (3aS-cis)-1,2,3,3a,8,8a-hexahydro- 1,3a,8-trimethylpyrrolo[2,3-b]indol-5-yl methylcarbamate ester (1:1) (Physostigmine salicylate)
P189	Carbamic acid,[(dibutylamino)thio]methyl-, 2,3-dihydro-2,2-dimethyl-7-benzofuranyl ester (Carbosulfan)
P190	Carbamic acid, methyl-, 3-methylphenyl ester (Metolcarb)
P191	Carbamic acid, dimethyl-, 1-[(dimethylamino)carbonyl]-5-methyl-1H-pyrazol-3-yl ester (Dimetilan)
P192	Carbamic acid, dimethyl-, 3-methyl-1-(1-methylethyl)-1H-pyrazol-5-yl ester (Isolan)
P194	Ethanimidothioc acid, 2-(dimethylamino)-N-[[[(methylamino)carbonyl]oxy]-2-oxo, methyl ester (Oxamyl)
P196	Manganese, bis(dimethylcarbamodithioato-S,S')- (Manganese dimethyldithiocarbamate)
P197	Methanimidamide, N,N-dimethyl-N'-[2-methyl-4-[[[(methylamino)carbonyl]oxy}phenyl]- (Formparanate)
P198	Methanimidamide, N,N-dimethyl-N'-[3-[[[(methylamino)carbonyl]oxy}phenyl]-,monohydrochloride(Formetanate hydrochloride)
P199	Phenol, (3,5-dimethyl-4-(methylthio)-, methylcarbamate (Methiocarb)
P201	Phenol, 3-methyl-5-(1-methylethyl)-, methylcarbamate (Promecarb)
P202	Phenol, 3-(1-methylethyl), methylcarbamate (Hercules AC-5727)
P203	Propanal,2-methy-2-(methylsulfonyl)-,O-[(methylamino)carbonyl]oxime (Aldicarb sulfone)
P204	Pyrrolo(2,3-b)indol-5-ol, 1,2,3,3a,8,8a-hexahydro-1,3a,8-trimethyl, methylcarbamate (ester), (3aS-cis)- (Physostigmine)
P205	Zinc, bis(dimethylcarbamodithioato-S,S')-, (Ziram)

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Attachment A: Waste List
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U271	Carbamic acid, {1-[(butylamino)carbonyl]-1H-benzamidazol-2-yl}-, methyl ester (Benomyl)
U277	Carbamodithioic acid, diethyl-, 2-chloro-2-propenyl esters (Sulfallate)
U278	1,3-Benzodioxol-4-ol, 2,2-dimethyl-, methyl carbamate (Bendiocarb)
U279	1-Naphthalenol, methylcarbamate (Carbaryl)
U280	Carbamic acid, (3-chlorophenyl)-, 4-chloro-2-butyryl ester (Barban)
U364	1,3-benzodioxol-4-ol, 2,2-dimethyl-, (Bendiocarb phenol)
U365	1H-Azepine-1-carbothioic acid, hexahydro-, S-ethyl ether (Molinate)
U366	2H-1,3,5-thiadiazine-2-thione, tetrahydro-3,5-dimethyl- (Dazomet)
U367	7-Benzofuranol, 2,3-dihydro-2,2-dimethyl- (Carbofuran phenol)
U372	Carbamic acid, 1H-benzimidazol-2-yl, methyl ester (Carbendazim)
U373	Carbamic acid, phenyl-, 1-methylethyl ether (Propham)
U375	Carbamic acid, butyl-, 3-ido-2-propynyl ester (Troysan Plyphase)
U376	Carbamodithioic acid, dimethyl-, tetraanhydrosulfide with orthothioselenious acid (Seleneum dimethyldithiocarbamate)
U377	Carbamodithioic acid, methyl-, -monopotassium salt (Potassium n-methyldithiocarbamate)
U378	Carbamodithioic acid, (hydroxymethyl)methyl-, monopotassium salt (Busan 40)
U379	Carbamodithioic acid, dibutyl, sodium salt (Sodium dibutyldithiocarbamate)
U381	Carbamodithioic acid, diethyl-, sodium salt (Sodium diethyldithiocarbamate)
U382	Carbamodithioic acid, dimethyl-, sodium salt (Dibam)
U383	Carbamodithioic acid, dimethyl, potassium salt (Potassium dimethyl dithiocarbamate) (Busan 85)
U384	Carbamodithioic acid, methyl-, monosodium salt (Metam Sodium)
U385	Carbamodithioic acid, dipropyl-, S-propyl ester (Vemolate)
U386	Carbamodithioic acid, cyclohexylethyl, S-ethyl ester (Cycloate)
U387	Carbamodithioic acid, dipropyl-, S-(phenylmethyl) ester (Prosulfocarb)
U389	Carbamodithioic acid, bis(1-methylethyl)-, S-(2,3,3-trichloro-2-propenyl) ester (Triallate)
U390	Carbamodithioic acid, dipropyl-, S-ethyl ester (Eptam)
U391	Carbamodithioic acid, butylethyl-, E-propyl ester (Pebulate)
U392	Carbamodithioic acid, bis(2-methylpropyl)-, S-ethyl ester (Butylate)
U393	Copper, tris(dimethylcarbamodithioato- S,S')-, (Copper dimethyldithiocarbamate)
U394	Ethanimidothioic acid, 2-(dimethylamino)-N-hydroxy-2-oxo-, methyl ether (A2213)
U395	Ethanol, 2,2'-oxybis-, dicarbamate (Reactacres 4-DEG)
U396	Iron, tris(dimethyl carbamodithioato-S,S')- (Ferbam)
U400	Piperidine, 1,1'-(tetrathiodicarbonothioyl)-bis- (Sulfads)
U401	Bis(dimethyl thiocarbamoyl) sulfide (Tetramethylthiuram monosulfide)
U402	Thioperoxydicarbonic diamide, tetrabutyl (Butyl Tuads)

Hydrocarbon Recyclers, Inc. of Wichita

Class 1 Permit Modification

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Attachment A: Waste List

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U403	Thioperoxydicarbonic diamide, tetraethyl (Disulfram)
U404	Ethanamine, N,N-diethyl- (Triethylamine)
U407	Zinc, bis(diethylcarbamodithioato-S,S') (Ethyl Ziram)
U409	Carbamic acid, [1,2-phenylenebis(iminocarbonothioyl)]bis-, dimethyl ester (Thiophanate-methyl)
U410	Ethanomidothoic acid, N,N'-{thiobis[(methylimino)carbonyloxy]}bis-, dimethyl ester (Thiodicarb)
U411	Phenol, 2-(1-methylethoxy)-, methylcarbamate (Propoxur)

Hydrocarbon Recyclers, Inc. of Wichita
Attachment B: Instructions, RCRA Permit Replacement Pages
May 12, 1995

REPLACEMENT PAGES WITH CORRECTIONS FOR HRIW RCRA PERMIT

The table below shows the pages to be replaced in the RCRA Permit Application for HRIW. The replacement pages are listed in the order they appear. Comments are provided, where required, to explain the corrections.

RCRA PART A APPLICATION

<u>Take Out Page(s)</u>	<u>Put In Page(s)</u>	<u>Comments</u>
G6 of 7	G6 of 7	Add new waste codes K156 through K161.
N6 of 7 to R6 of 7	N6 of 7 to T6 of 7	Add new waste codes from P127 through P205 and from U271 through U411.
7 of 7	7 of 7	Replace signature page.

RCRA PART B APPLICATION

Attachment C-B to Appendix C-A, List of EPA Waste Codes

<u>Take Out Page(s)</u>	<u>Put In Page(s)</u>	<u>Comments</u>
Cover to WL.34	Cover to WL.39	Replace entire attachment and add newly listed wastes.

EPA I.D. Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
K	S	D	0	0	7	2	4	6	8	4	6												

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature	<i>Stephen M Keiter</i>	Date Signed	May 12, 1995
Name and Official Title (Type or print)	Stephen M. Keiter, Vice President of Operations		
Owner Signature		Date Signed	
Name and Official Title (Type or print)			
Operator Signature	<i>Stephen M Keiter</i>	Date Signed	May 12, 1995
Name and Official Title (Type or print)	Stephen M. Keiter, Vice President of Operations		
Operator Signature		Date Signed	
Name and Official Title (Type or print)			

XIX. Comments

This is a revision to the Part A Hazardous Waster Permit Application dated December 20, 1993. Hydrocarbon Recyclers Inc. of Wichita does business as USPCI, Inc., as Hydrocarbon Recyclers, Inc., as Treatment and Recovery Services, and as Laidlaw Environmental Services.

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)